

Job Title :WWOJ(FM), AVON PARK, FL.

Separation Buffer 32 km

FCC DB Date : 04/27/93

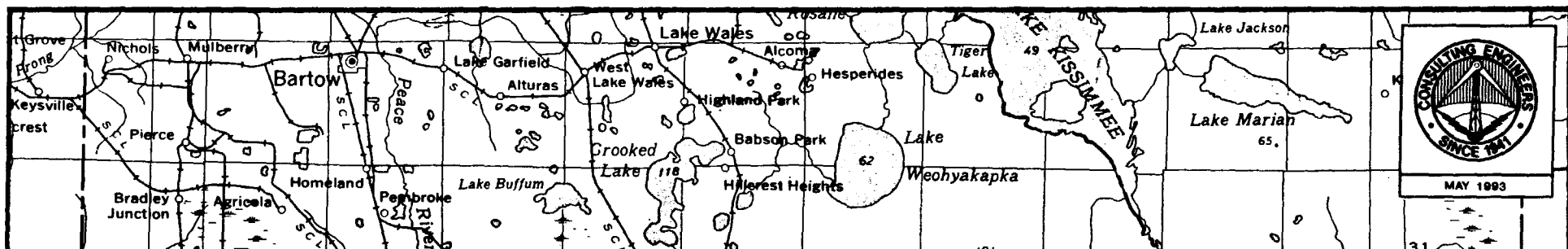
Channel 256A ( 99.1 MHz)

Coordinates : 27-33-37 81-29-36

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
WLRQFM CP	Cocoa FL	BPH890515IF	257C2 99.3	50. 150.0	28-16-42 80-42-03	44.1	111.44	106 CLOSE
From channel 257A per D87-527								
WJBX LIC	Fort Myers Beach FL	BLH920720KC	257C2 99.3	50. 87.0	26-30-18 81-51-14	197.0 SS	122.29	106 CLEAR
From channel 257A per D88-384								
WQYKFM CP	St. Petersburg FL	BPH870227NC	258C1 99.5	44. 414.0	27-50-32 82-15-46	292.7	82.08	75 CLOSE
CP Cancelled 930319								
WQYKFM LIC	St. Petersburg FL	BLH800313AC	258C1 99.5	100. 168.0	27-56-50 82-27-35	294.6	104.49	75 CLEAR
WVDO CP	Vero Beach FL	BPH880523MV	259C2 99.7	50. 98.0	27-46-38 80-27-17	76.5 SS	105.26	55 CLEAR

\*\* End of separation study for channel 256A \*\*

Study based on present WWOJ site.



TECHNICAL STATEMENT  
IN SUPPORT OF  
COMMENTS AND A COUNTERPROPOSAL  
MM DOCKET NO. 93-65  
WGUL-FM, INC.  
NEW PORT RICHEY, FLORIDA

Allocation Study

Job Title :WGUL-FM, NEW PORT RICHEY, FL.

Separation Buffer 50 km

FCC DB Date : 04/27/93

Channel 288C1 (105.5 MHz)

Coordinates : 28-11-04 82-45-39

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
WYNFFM LIC	Tampa FL	BMLH880122KB	235C 94.9	100. 393.0	27-49-09 82-14-26	128.4	65.26	41 CLEAR
WMMY APP	Solana FL	BMPH930129IA	285A 104.9	6.0 97.0	DA 26-53-37 82-03-03	153.8 SS	159.31	75 CLEAR
From Channel 287A Per D89-469								
WOMXFM LIC	Orlando FL	BLH820712AI	286C 105.1	100. 399.0	28-36-17 81-05-13	73.7	170.54	105 CLEAR
WYKS APP	Gainesville FL	BPH930412IB	287A 105.3	6.0 81.0	29-37-52 82-25-18	11.5	163.72	133 CLEAR
From Channel 288A Per D90-164								
WGULFM CP	New Port Richey FL	BPH891002ID	288A 105.5	6. 87.0	28-15-32 82-43-54	19.1	8.74	
WKZM LIC	Sarasota FL	BLH6432	288A 105.5	3.00 55.0	27-19-25 82-27-40	162.8	99.87	200 1 SHORT
WKZM CP	Sarasota FL	BPH890929IF	288A 105.5	3. DA 100.0	27-16-30 82-28-54	164.7 SS	104.48	200 1 SHORT
WCAC LIC	Sebring FL	BLH4041	288A 105.5	3.00 46.0	27-28-06 81-27-03	121.4	151.52	200 2 SHORT

<sup>1</sup> It is proposed to change WKZM's frequency from channel 288 to 282. Therefore, no short-spacing results.

<sup>2</sup> It is proposed to change WCAC's frequency from channel 288 to 289. Therefore, no short-spacing results.

Job Title :WGUL-FM, NEW PORT RICHEY, FL.

Separation Buffer 50 km

FCC DB Date : 04/27/93

Channel 288C1 (105.5 MHz)

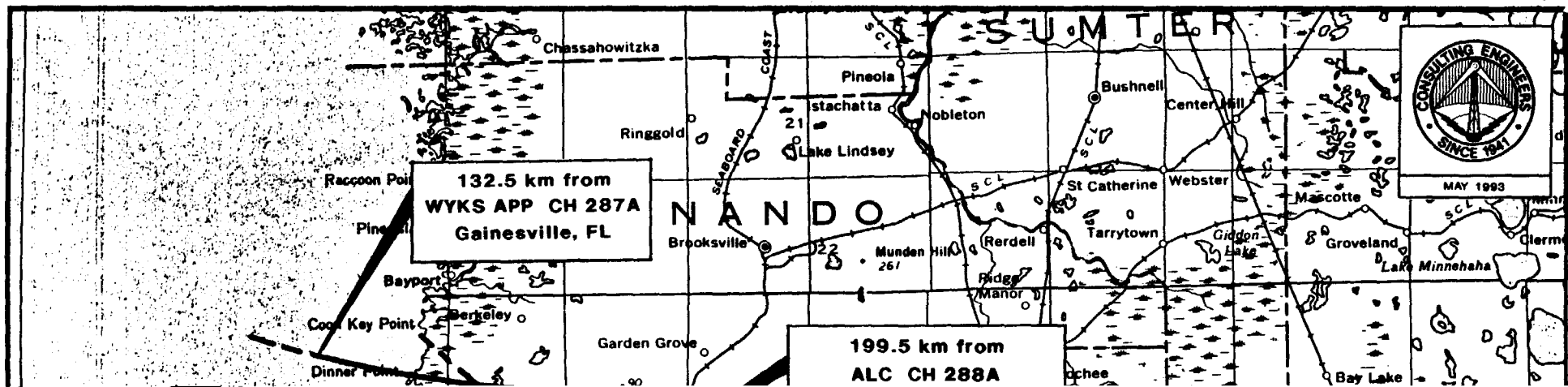
Coordinates : 28-11-04 82-45-39

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
WCAC CPM	Sebring FL	BMPH920903JZ	288A 105.5	3.00 100.0	27-27-13 81-24-23	121.1	156.11	200 SHORT
WYKS LIC	Gainesville FL	BLH4780	288A 105.5	3.00 81.0	29-37-52 82-25-18	11.5	163.72	200 SHORT
*To Channel 287A Per D90-164								
WNFK APP	Perry FL	BMPH890906IA	288A 105.5	3.0 56.0	30-06-42 83-34-03	340.1	227.57	200 CLEAR
WIXI PADD	Naples Park FL		288C2 105.5		26-19-00 81-47-13	154.9	228.33	224 CLOSE
WIXI CP	Naples Park FL	BPH921125ID	288C3 105.5	7.1 181.0	26-19-00 81-47-13	154.9 SS	228.33	211 CLEAR
From Channel 288A Per D89-469								
ALC	St. Augustine Beach FL	Docket90-164	288A 105.5		29-50-52 81-19-42	36.6	231.22	200 CLEAR
Site Restricted-Effective 8-13-92								
WSOS LIC	St. Augustine FL	BLH860714KA	288A 105.5	2.25 115.0	29-55-05 81-23-26	34.3	233.94	200 CLEAR
*To Channel 231C3 Per D90-164								
WCAC PADD	Sebring FL		289A 105.7		27-26-25 81-27-00	122.4	153.24	133 CLEAR
WCAC PADD	Sebring FL		289C3 105.7		27-20-30 81-28-05	126.1	158.00	144 CLEAR
NEW APPD	Englewood FL	BPH870910NS	290A 105.9	3.00 100.0	27-01-07 82-17-10	160.0	137.43	75 CLEAR
Amended 881108								

\*\* End of separation study for channel 288C1 \*\*

Study based on site of WTSP-TV for reference purpose.

<sup>3</sup> Station WYKS has been ordered from channel 288A to 287A (MM Docket 90-164). Therefore, no short-spacing results.



TECHNICAL STATEMENT  
IN SUPPORT OF  
COMMENTS AND A COUNTERPROPOSAL  
MM DOCKET NO. 93-65  
WGUL-FM, INC.  
NEW PORT RICHEY, FLORIDA

Allocation Study

Job Title :WGUL-FM, NEW PORT RICHEY, FL.

Separation Buffer 50 km

Channel 288C2 (105.5 MHz)

FCC DB Date : 04/27/93  
Coordinates : 28-11-04 82-45-39

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
WYNFFM LIC	Tampa FL	BMLH880122KB	235C 94.9	100. 393.0	27-49-09 82-14-26	128.4	65.26	35 CLEAR
WOMXFM LIC	Orlando FL	BLH820712AI	286C 105.1	100. 399.0	28-36-17 81-05-13	73.7	170.54	105 CLEAR
WYKS APP	Gainesville FL	BLH930412IB	287A 105.3	6. 81.0	29-37-52 82-25-18	11.5	163.72	106 CLEAR
Effective 1-8-93-Reserved for WYKS per D90-164, from Channel 288A								
WGULFM CP	New Port Richey FL	BPH891002ID	288A 105.5	6. 87.0	28-15-32 82-43-54	19.1	8.74	
WKZM LIC	Sarasota FL	BLH6432	288A 105.5	3.00 55.0	27-19-25 82-27-40	162.8	99.87	166 1 SHORT
WKZM CP	Sarasota FL	BPH890929IF	288A 105.5	3. DA 100.0	27-16-30 82-28-54	164.7 SS	104.48	166 1 SHORT
WCAC LIC	Sebring FL	BLH4041	288A 105.5	3.00 46.0	27-28-06 81-27-03	121.4	151.52	166 2 SHORT
WCAC CPM	Sebring FL	BMPH920903JZ	288A 105.5	3.00 100.0	27-27-13 81-24-23	121.1	156.11	166 2 SHORT

Job Title :WGUL-FM, NEW PORT RICHEY, FL.

Separation Buffer 50 km

FCC DB Date : 04/27/93

Channel 288C2 (105.5 MHz)

Coordinates : 28-11-04 82-45-39

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
WYKS LIC	Gainesville FL	BLH4780	288A 105.5	3.00 81.0	29-37-52 82-25-18	11.5	163.72	166 3 SHORT
*To Channel 287A Per D90-164								
WIXI PADD	Naples Park FL		288C2 105.5		26-19-00 81-47-13	154.9	228.33	190 CLEAR
WCAC PADD	Sebring FL		289A 105.7	.9	27-26-25 81-27-00	122.4	153.24	106 CLEAR
WCAC PADD	Sebring FL		289C3 105.7		27-20-30 81-28-05	126.1	158.00	117 CLEAR
NEW APPD	Englewood FL	BPH870910NS	290A 105.9	3.00 100.0	27-01-07 82-17-10	160.0	137.43	55 CLEAR
Amended 881108								

\*\* End of separation study for channel 288C2 \*\*

Study based on site of WTSP-TV for reference purposes.

<sup>3</sup> Station WYKS has been ordered from channel 288A to 287A (MM Docket 90-164). Therefore, no short-spacing results.

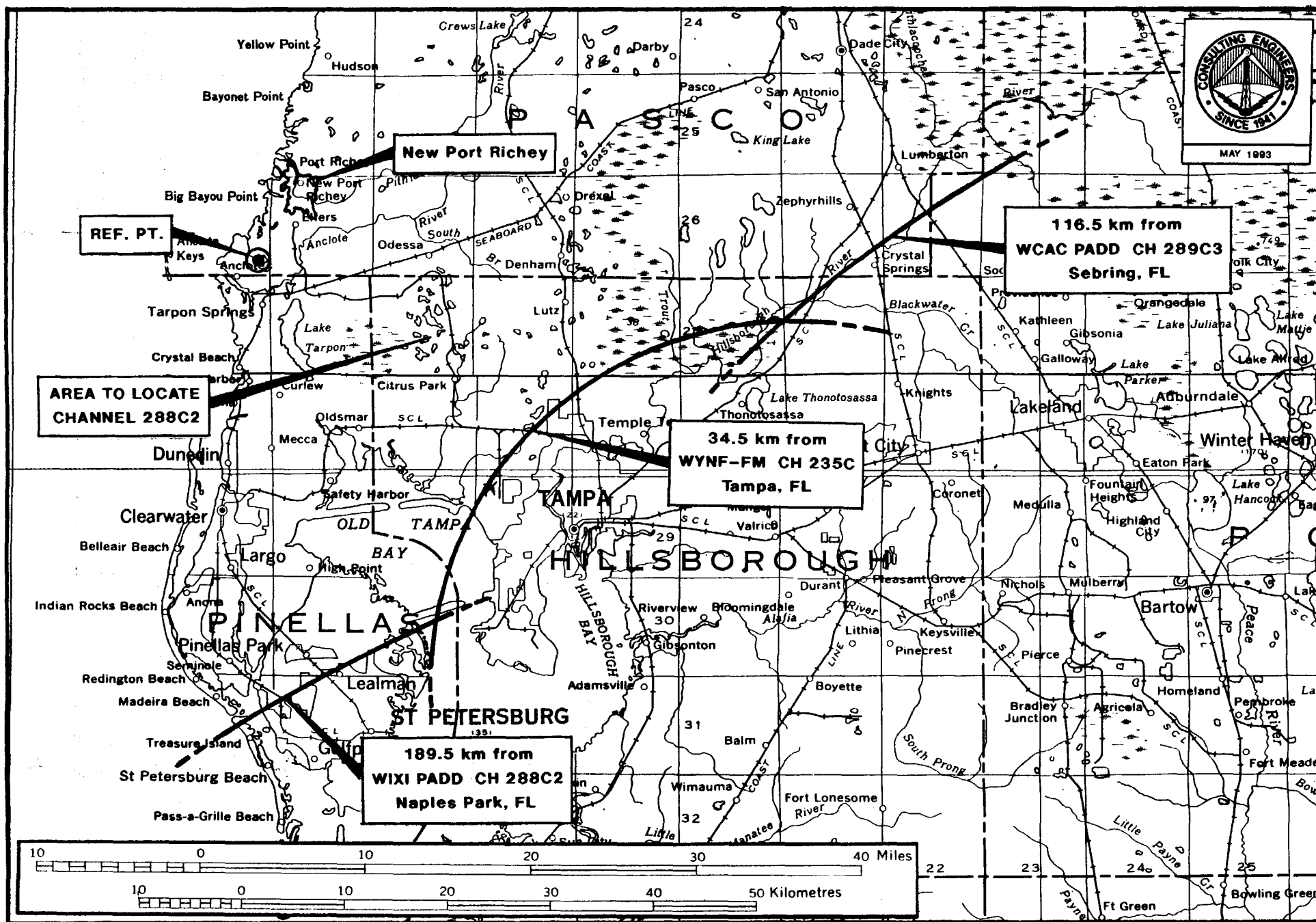


Figure 4  
Sheet 3 of 3



**EXHIBIT 4**



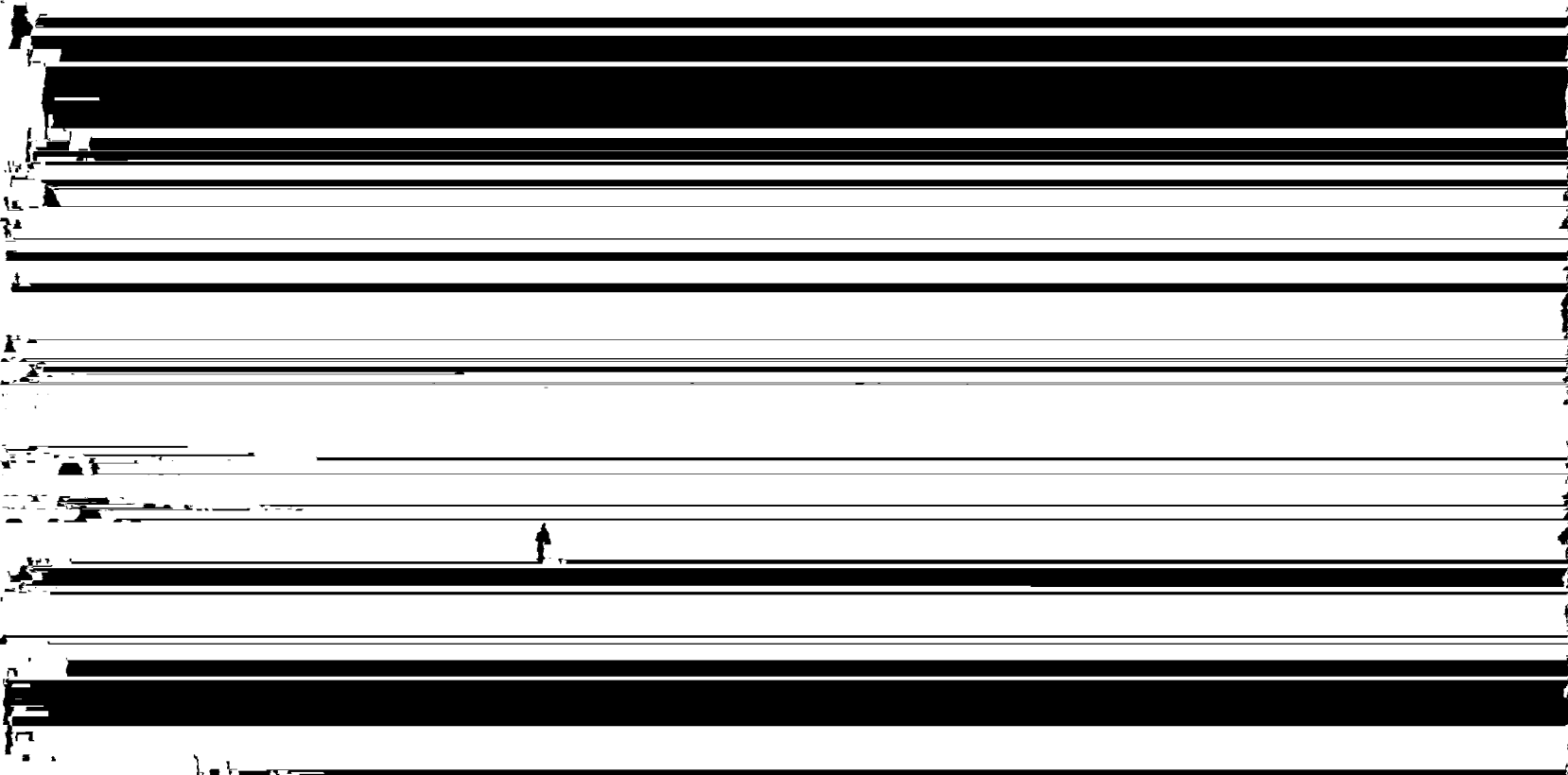
c. 256A for 292A at Avon Park, Florida (Highlands' station).

3. Recently, however, the Commission made different substitutions at Holiday and Sarasota in MM Docket No. 92-195.<sup>3</sup> Thus for all practical purposes the sole remaining proposal in this proceeding is the substitution at Avon Park.

4. The Avon Park substitution was originally proposed to accommodate the channel upgrade at Holiday, Florida. But since the Docket 92-195 changes do not involve a change at Avon Park, it may appear the Avon Park substitution is now moot.

5. That is not the case. The Avon Park substitution has substantial independent public interest value such that it deserves consideration its own merits.

6. As shown in the first of the attached FM channel studies (Exhibit A), the existing channel 292A at Avon Park does not meet the current Rule 73.207 conservation requirements and thus cannot



7. However, as Exhibit B shows, the proposed channel 256A substitution does meet current separation requirements, and thus could be implemented with full class A facilities. Highlands has not prepared a formal exhibit depicting the gain areas thus achievable, but it is clear that channel 256A facilities would clearly enhance service in this relatively rural area where locally-oriented programming such as WWOJ provides is scarce.

8. For this reason alone, the Commission has ample basis to modify the license for station WWOJ to specify operation on channel 256A in lieu of channel 292A at Avon Park, Florida.<sup>4</sup> Highlands hereby reaffirms its intent to implement such a change by filing an appropriate application at the appropriate time.

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<sup>4</sup> Highlands understands that given the Commission action in Docket 92-195, the Avon Park channel substitution is no longer a pre-condition for the Holiday upgrade. Highlands therefore agrees not to invoke the Commission's processes under Circleville, Ohio, 8 FCC 2d 159 (1967), to seek reimbursement of its expenses for changing to channel 256A. (This acknowledgement does not, however, constitute waiver of Highlands' private contractual rights under its agreements with the licensee of station WLVU in connection with this proceeding.)

9. For the reasons set out above, Highlands requests the Commission to substitute channel 256A for 292A at Avon Park, Florida, and to modify the license of station WWOJ accordingly. This action will permit the Commission to finally close what Highlands believes is the fourth oldest FM rule making proceeding still open, and to foster improved FM broadcast service in rural central Florida.

Respectfully submitted,

HIGHLANDS MEDIA COMPANY, INC.

By:

  
John M. Spencer  
Its Counsel

Leibowitz & Spencer  
One S.E. Third Avenue, Suite 1450  
Miami, Florida 33131  
(305) 530-1322

April 19, 1993

JAMES M. JOHNSON & ASSOCIATES  
3750 US 27 NORTH SEBRING FL 33870

EXHIBIT A

WVOJ AVON PARK FLORIDA  
CHANNEL 292-A

REFERENCE	CLASS A	DISPLAY DATES
27 33 37 N		DATA 02-24-93
81 29 36 W	Current rules spacings	SEARCH 04-15-93
----- CHANNEL 292 -106.3 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
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JAMES M. JOHNSON & ASSOCIATES  
3750 US 27 NORTH SEBRING FL 33870

EXHIBIT B

WWOJ AVON PARK FLORIDA  
CHANNEL 256-A AT PRESENT SITE

REFERENCE  
27 33 37 N  
81 29 36 W

CLASS A  
Current rules spacings  
CHANNEL 256 - 99.1 MHz

DISPLAY DATES  
DATA 02-24-93  
SEARCH 04-15-93

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
AD256	256A	Avon Park	FL	0.0	0.00	115.0	-115.00 *
WMMO	255C2	Orlando	FL	5.9	109.11	106.0	3.11
WLRQFM	257C2	Cocoa	FL	44.4	111.43	106.0	5.43
WQYKFM	258C1	St. Petersburg	FL	292.4	82.07	75.0	7.07
WJBX	257C2	Fort Myers Beach	FL	197.0	122.28	106.0	16.28
AD255	255A	Murdock	FL	226.7	88.64	72.0	16.64
WEDR	256C1	Miami	FL	144.1	217.95	200.0	17.95
WKGR	254C	Fort Pierce	FL	114.0	119.56	95.0	24.56
AD255	255A	Murdock	FL	224.1	99.76	72.0	27.76
WQYKFM	258C1	St. Petersburg	FL	294.2	104.48	75.0	29.48
WLRQFM	257A	Cocoa	FL	44.4	111.43	72.0	39.43

CERTIFICATE OF SERVICE

I, John M. Spencer, hereby certify that a copy of the attached Petition to Accept Comments and a copy of the attached Comments in MM Docket No. 87-455 were this 19th day of April, 1993, sent to the following persons by First Class U.S. Mail (or \* by Airborne Express), in fulfillment of the requirements of Rules 1.47 and 1.420:

\* Robert Hayne, Esq.  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
Washington, D.C. 20554

Sarasota FM, Inc.  
Radio Station WSRZ  
1713 Ken Thomson Parkway



**CERTIFICATE OF SERVICE**

I, Toni R. Daluge, a secretary with the law firm of Kaye, Scholer, Fierman, Hays & Handler, do hereby certify that a copy of the foregoing "Comments and Counterproposal" was mailed this 1st day of June, 1993, first class, postage prepaid, to the following:

Mr. Michael Ruger, Chief\*  
Allocations Branch  
Federal Communications Commission  
2025 M Street, N.W., Room 8322  
Washington, D.C. 20554

Nancy J. Walls, Esquire\*  
Mass Media Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 8317  
Washington, D.C. 20554

Mr. Lowell A. Brubaker, President  
Christian Fellowship Mission, Inc.  
P.O. Box 7627  
Sarasota, FL 34278

Irving Gastfreund, Esquire\*  
Kaye, Scholer, Fierman, Hays & Handler  
901 15th Street, N.W.  
Washington, D.C. 20005

John Spencer, Esq.  
Leibowitz & Spencer  
One Southeast Third Avenue  
Suite 1450  
Miami, Florida 33131

  
\_\_\_\_\_  
Toni R. Daluge

\*Hand delivered.